

TOWN OF SOUTH HADLEY
DIVISION OF WATER POLLUTION CONTROL
NPDES PERMIT #MA0100455
2021 INDUSTRIAL PRETREATMENT ANNUAL REPORT

Town of South Hadley
Division of Water Pollution Control

- 1) An updated list of all significant industrial users by category as set forth in 40 CFR 403.8 (f) (2) (i), indicating compliance or noncompliance with the following:
 - A) Baseline monitoring reporting requirements for newly promulgated industries: N/A - No SIU's
 - B) Compliance status reporting requirements for newly promulgated industries: N/A - No SIU's
 - C) Periodic monitoring reporting requirements: N/A - No SIU's
 - D) Categorical Standards: N/A - No CIU's
 - E) Local Limits: N/A - No SIU's
- 2) A summary of compliance and enforcement activities during the preceding year including the number of:
 - A) Significant industrial users inspected by the Publicly Owned Treatment Works (include dates).
N/A – No SIU's
 - B) Significant industrial users sampled by the POTW (include sampling dates):
N/A – No SIU's
 - C) Compliance schedules issued (include list of subject users): N/A – No SIU's
 - D) Written Notices of Violation (NOV's) issued (include list of subject users): N/A – No SIU's
 - E) Administrative Orders issued (include list of subject users): N/A – No SIU's
 - F) Criminal or civil suits filed (include list of subject users): N/A – No SIU's
 - G) Penalties obtained (include list of subject users): N/A – No SIU's
- 3) A list of significantly violating industries required to be published in a local newspaper in accordance with 40 CFR 403.8 (f) (2) (VII): N/A – No SIU's
- 4) A narrative description of program effectiveness, including present and proposed changes to the program, such as funding, staffing, ordinances, regulations, rules and/or statutory authority:

There are currently no significant industrial users in the Town of South Hadley. All pretreatment program components remain in place, and funding, staffing and authority are adequate should the need arise in the future.
- 5) A summary of all pollutant analytical results for influent, effluent, sludge, and any toxicity or bioassay data from the wastewater treatment facility. The summary shall include a comparison of influent sampling results versus threshold inhibitory concentrations for (Municipality's) waste water treatment system and effluent sampling results versus water quality standards. Such a comparison shall be based on the sampling program described in the paragraph below or any other similar sampling program described in the Permit. At a minimum, annual sampling and analysis of the influent and effluent of the (Municipality's) wastewater treatment plant shall be conducted for the following pollutants: Total Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Silver, Zinc, Cyanide and Arsenic.

The Sampling Program shall consist of one 24 hour flow proportioned composite and at least one grab sample which is representative of the flows received by the POTW. The composite shall consist of hourly

flow proportioned grab samples taken over a 24-hour period if the sample is collected manually or shall consist of a minimum of 48 samples collected at 30-minute intervals if an automated sampler is used. Cyanide shall be taken as a grab sample during the same period as the composite sample. Sampling and preservation shall be consistent with 40 CFR part 136.

Data summaries of the annual influent /effluent testing, toxicity and sludge testing for the South Hadley WWTF are attached to this report.

- 6) A detailed description of all interference and pass-through during the past year.
There were no instances of interference or pass-through during 2021.
- 7) A thorough description of all investigations of interference and pass-through during the past year:
There were no instances of interference or pass-through during 2021.
- 8) A description of monitoring, sewer inspections, and evaluations which were made during the past year to detect interference and pass-through, specifying parameters and frequencies:

The WPC Superintendent oversees industries subject to the Industrial Pretreatment Program. There are currently no significant industrial users in South Hadley, however there are three users regulated under a local general permit program. In addition to this oversight, the Superintendent annually reviews the water consumption records for all commercial and industrial establishments. The Town Planner will request input during the Site Plan Review Process if a proposed commercial or industrial entity proposes to discharge wastewater, and the DPW Superintendent reviews all Applications for Sewer System Extensions and Connections and would notify the Compliance Manager of any potential industrial connections. There were no new industries considered for inclusion in the Industrial Pretreatment Program in 2021.

The Town of South Hadley has a two man "sewer crew" whose main function is to maintain the sewer lines in Town. The crew frequently checks and maintains sections of the Town sewer system that are known trouble spots, conducts scheduled cleaning of the sewer lines and storm drains, and is on call at all times for emergency situations. Should they notice anything unusual upon opening a manhole, the crew would notify the Foreman of the Highway Division and the Compliance and Operations Managers of the Wastewater Treatment Plant. The Town has also implemented a Fats, Oil & Grease (FOG) Control Program to control and prevent problems in the sewer lines and pump station wet wells. The Program was developed by and is enforced under the Industrial Pretreatment Program.

The WWTP monitors in accordance with its Discharge (NPDES) Permit, which was renewed effective December 1, 2012. This includes daily and twice weekly monitoring requirements for conventional pollutant parameters, as well as weekly and monthly requirements, annual influent / effluent testing and twice yearly Toxicity Testing. The annual testing is a comprehensive sampling program which includes conventional pollutants, and any other parameter determined to be of interest. The sludge is tested on a quarterly basis. Additional samples are taken as necessary for various reasons such as sheen, odor or other non-routine occurrence, or when interference or pass-through is suspected or known to have occurred. A summary of the analytical data for the WWTF's annual influent / effluent testing, toxicity and sludge testing is attached to this report.

- 9) A description of actions taken to reduce the incidence of significant violations by significant industrial users: N/A – No SIU's
- 10) The date of the latest adoption of local limits and an indication of whether or not the Town is under a State or Federal Compliance Schedule that includes steps to be taken to revise local limits.

The latest adoption of local limits occurred on December 1, 1995. All of the industries involved in the Industrial Pretreatment Program were notified of the adoption and were issued copies of the new Local Limits and Sewer Use Rules and Regulations. A review of the Local Limits and the Reassessment of the Technically Based Local Limits was required as part of the NPDES Permit issued in 2001. The Reassessment was submitted to EPA on February 18, 2002. Verbal Notification was given by EPA on September 27, 2002 that there was no need to revise Local Limits at that time. The NPDES Permit which became effective on December 1, 2012 required a technical review of Local Limits, which was submitted to EPA on April 20, 2013.